

REMARKS

This is in response to the Final Office Action mailed April 5, 2005. Claims 1-59 are pending in this Application. Applicants respectfully request reconsideration in light of the following arguments.

I. SUMMARY OF THE INVENTION

Figure 1 of the present Application is an illustration of a virtual content management framework for integrating a plurality of content repositories into a single, virtual repository in an embodiment. A virtual or federated content repository (hereinafter referred to as “VCR”) **100** is a logical representation of one or more individual content repositories **108** such that they appear and behave as a single content repository from an application program’s **110** standpoint. In this way, an application program **110** does not need to know the particulars of a given vendor’s content repository system. For example, a command to search content in the VCR **100** will be translated automatically into vendor-specific commands to search the content in each of the plurality of content repositories **108**.

In one embodiment, a content model **106** represents the combined content of all repositories **108** as a hierarchical namespace of nodes. At the top of the hierarchy is a federated root. Beneath the root are content repositories **108**. Likewise, each content repository can have child nodes representing the content of that repository. Nodes are analogous to directories and files in a file system: they can represent hierarchy structure information or content. In this way, all of the content of all of the repositories **108** is integrated into a single hierarchical namespace.

II. OVERVIEW OF THE CITED ART

The Examiner rejected claims 1-59 under 35 USC §102(e) as being anticipated by U.S. Publication No. 2004/0024812 (“Park”). As a preliminary matter, Park discloses a system for integrating and processing multimedia content – *not* content repositories. Park, ¶11. In contrast, embodiments of Applicants’ invention integrate a plurality of content repositories such that they behave as a single, virtual content repository. Merely integrating

content does not teach or suggest integrating content repositories into a virtual content repository.

This fundamental difference between Park and the present Application is further borne out with reference to Figure 1 in Park. Note that Park only discloses a single repository 8. According to Park, “the service operating function includes publishing content stored in the repository 8 in real time at a users [sic] request.” Park, ¶31. In addition, “[t]he service publication server 4 can be provided with data from data sources such as a relational database system 15a, a file system 15b, a web site 15c on the Internet, an e-mail server 15d, and an application program 15e providing result data in XML.” Id. Merely obtaining data from various sources does not teach or suggest integrating content repositories into a virtual content repository.

A closer examination of repository 8 and service publication server 4 in Figure 5 reveals a lack of any facility for integrating a plurality of content repositories. Park teaches a repository management tool 7 “for integrally managing content which will be used for publication” – but this tool does *not* integrate content repositories. Park, ¶28 (emphasis added). Again, this underscores a fundamental difference between Park and the present Application.

Additionally, Park does not disclose a virtual content repository wherein a plurality of content repositories combine efforts to act as a single content repository. Park only discloses a single repository 8 that contains a single content repository 70 which in turn contains virtual web pages called “containers” 74. Park, ¶41. It follows that Park does not disclose a namespace that encompasses all of the information in a plurality of repositories. Instead, Park simply teaches that “containers 74 are stored in a directory 72 having a hierarchical structure.” Park, ¶41. Merely storing virtual web pages in a hierarchical directory does not teach or suggest a namespace encompassing a plurality of content repositories.

Finally, Park does not disclose a content model that includes content from a plurality of repositories. Content in a “container” in Park is converted into a container document object model 55. Park, ¶59. However, merely converting a container (i.e., a virtual web page) into another format does not teach or suggest a content model that includes content from a plurality of repositories. Again, Park only discloses a single content repository 70.

III. ISSUES

The Examiner rejected claims 1-59 under 35 USC §102(e) as being anticipated by U.S. Publication No. 2004/0024812 (“Park”). To anticipate a claim, every element of the claim must be disclosed within a single reference. Applicants respectfully submit that Park fails in this regard.

IV. ARGUMENT

A. *Independent claims 1, 11, 21, 30, 40 and 50 recite in part, each one of said plurality of content repositories expose a first set of services to enable its integration into a VCR.*

As discussed above in *Section II*, Park does not teach or suggest a mechanism that would allow repositories to integrate themselves into a virtual content repository. Park teaches a repository management tool 7 “for integrally managing content which will be used for publication” –not for integrating content repositories. Park, ¶28 (emphasis added).

Accordingly, independent claims 1, 11, 21, 30, 40 and 50 are not anticipated by Park for at least these reasons. It follows that the claims which depend from these are patentable for at least the same reasons.

B. *Independent claims 1, 11, 21, 40 and 50 recite in part, wherein the VCR is a logical representation of the plurality of content repositories such that the plurality of content repositories behave as a single content repository.*

As discussed above in *Section II*, Park does not teach or suggest a virtual content repository (VCR) wherein a plurality of content repositories combine efforts to act as a single content repository. Park only discloses a single repository 8 that contains a single content repository 70 which in turn contains virtual web pages called “containers” 74. Park, ¶41.

Accordingly, independent claims 1, 11, 21, 40 and 50 are not anticipated by Park for at least these reasons. It follows that the claims which depend from these are patentable for at least the same reasons.

C. *Independent claims 11, 30, 40 and 50 recite in part, incorporating each one of said plurality of content repositories into a hierarchical namespace; extending a content model to include content from each one of said plurality of content repositories.*

As discussed above in *Section II*, Park only discloses **a single repository 8** that contains **a single content repository 70** which in turn contains virtual web pages called “containers” 74. Park, ¶41. It follows that Park does not disclose a namespace that encompasses all of the information in a plurality of repositories. Instead, Park teaches that “containers 74 are stored in a directory 72 having a hierarchical structure.” Park, ¶41. Merely storing virtual web pages in a hierarchical directory does not teach or suggest a namespace encompassing a **plurality of content repositories**.

Furthermore, Park does not disclose a content model that includes content from a plurality of repositories. Content in a “container” in Park is converted into a container document object model 55. Park, ¶59. However, merely converting a container (i.e., a virtual web page) into another format does not teach or suggest a content model that includes content from a **plurality of repositories**. Again, Park only discloses **a single content repository 70**.

Accordingly, independent claims 11, 30, 40 and 50 are not anticipated by Park for at least these reasons. It follows that the claims which depend from these are patentable for at least the same reasons.


V. CONCLUSION AND PRAYER FOR RELIEF

In view of the foregoing, a *prima facie* case of anticipation cannot be established, and the rejection must be overturned. Applicants request that the Examiner withdraw the rejection of all pending claims and hold that all of the claims of the present application are allowable.

The Commissioner is authorized to charge any underpayment or credit any overpayment to Deposit Account No. 06-1325 for any matter in connection with this response, including any fee for extension of time, which may be required.

Respectfully submitted,

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